

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1

Applicant Name: James R Parsons

Proceeding Name: 98-143 Author Name: James R Parsons

Lawfirm Name: =20

Contact Name: =20

Contact Email: parsons2@compassnet.com

Address Line 1: 5511 Cherokee Court

Address Line 2: =20

City: Rosenberg

State: TX ☒

Zip Code: 77471 Postal Code:

Submission Type: CO ☒ Submission Status: ACCEPTED ☒ Viewing Status: UNRESTRICTED ☒

Subject:

DA Number:

Exparte Late Filed: File Number:

Calendar Date Filed: 08/14/1998 10:03:01 AM

Date Disseminated:

Filed From: EMAIL

Official Date Filed: 08/14/1998

Date Released/Denied:

Initials:

Confirmation #

Date Filed:

DOCKET FILE COPY ORIGINAL

INTERNET FILING

98 - 143

08/14/98

I wholeheartedly agree with the ARRL letter included concerning =
Restructuring. Morse Code has been outmoded for quite a while and =
continuing the requirement for licensing is keeping otherwise talented =
people out of our ranks. As a Tech-Plus holder I can comment on why =
most of the Tech-Plus Airtime is on vhf-uhf, Most licensees can't =
justify the money for HF equipment just for 200Khz of Voice on 10 =
Meters, which as you know has been dead for the last few years.

Until The International community removes the requirement for Morse for =
HF Priveledges I think The ARRL Proposal is a GOOD Compromise.

July 22, 1998=20

Via Hand Delivery=20

Honorable William E. Kennard
Chairman
Federal Communications Commission=20

Honorable Susan Ness
Commissioner
Federal Communications Commission=20

Honorable Harold Furchtgott-Roth
Commissioner
Federal Communications Commission=20

Honorable Michael K. Powell
Commissioner
Federal Communications Commission=20

Honorable Gloria Tristani
Commissioner
Federal Communications Commission=20

Re: License Restructuring in the Amateur Radio Service=20

Dear Mr. Chairman and Commissioners:=20

It has come to the attention of the American Radio Relay League, =
Incorporated, the national association of amateur radio operators in =
the United States, that the Commission is presently considering a draft =
item pursuant to the 1998 Biennial Review process which relates to the =
Amateur Radio Service.=20

It is our understanding from discussions with the Wireless =
Telecommunications Bureau staff that this item will address several =
varied topics of current interest in the Amateur Service. Among these =
is an examination of certain licensing requirements for Amateur =
operators. The League's Board of Directors, which constitutes the most =
representative body of amateur radio operators in the country, has =
studied the amateur licensing structure for the past two and one-half =
years.=20

The League feels strongly that the Biennial Review process offers a =
timely and needed opportunity for simplification of what is now an =
overly complex licensing structure for the Amateur Service. =

Participation in the Amateur Service can be increased, and the benefits of Amateur Radio can be made available to more people. By increased participation, Amateur Radio can provide even more service to the United States than it does currently, with a simpler licensing structure. It is possible to reduce the regulatory burden on licensees, while preserving the opportunities for technical self-training that the Service now offers. Because Amateur Radio license examinations are administered and coordinated entirely in the private sector, there will be no regulatory burden on the Commission from any changes adopted.=20

Therefore, the League wishes to present for your consideration a comprehensive restructuring proposal for amateur radio licensing. The purpose of presenting this to you now, by letter, is not to forestall or preclude the Amateur Radio Biennial Review item, but rather to complement the considerable work that we understand has already been performed by your Wireless Telecommunications Bureau staff. It is hoped that the instant proposal is timely in view of the draft now under consideration.=20

Amateur Radio License Restructuring Proposal=20

The League's proposal is premised on the belief that the Amateur Radio Service no longer requires six different classes of license in its license structure. A simplified structure with four classes is preferable. The plan suggests four written examination elements to establish amateurs' operational and technical qualifications instead of the present five, and two telegraphy examination elements instead of the present three.=20

Under the plan, the entry level to Amateur Radio would be known as Class D and would convey the privileges of the present Technician license. The written examination would be at the same level of difficulty as that of the present Technician examination, but consistent with the privileges of the license. All amateurs now licensed as Technician class would become Class D licensees.=20

The next step would be known as Class C and would convey the privileges of the present General license, but with telephony sub-bands expanded by 50 kHz in the 3.5 and 21 MHz bands and by 25 kHz at 7 MHz. Class C would be the entry level to high frequency (HF) operating privileges. To upgrade from Class D to Class C, an amateur would pass a written examination on the operational and technical qualifications required for HF operation and a 5 word-per-minute telegraphy examination (instead of the present 13 word-per-minute examination required for General Class licensees). All amateurs now licensed as General, Technician Plus, and Novice would become Class C. The expansion of the telephony subbands would result from "refarming" of the Novice Class telegraphy subbands that are no longer required for their original purpose.=20

The third step would be known as Class B and would convey the privileges of the present Advanced Class license, but with telephony subbands expanded by 50 kHz in the 3.5 MHz and 21 MHz bands and by 25 kHz in the 7 MHz band. To upgrade from Class C to Class B, an amateur would pass a more advanced written examination similar in difficulty to the present Element 4A examination, and a 12 word per minute telegraphy examination. All amateurs now licensed as Advanced would become Class =

B. Any current General Class licensee, having already taken and passed =
the 13 word-per-minute telegraphy examination, will of course not have =
to retake a telegraphy examination to obtain a Class B license.=20

The final step would be known as Class A and would convey the full =
privileges of the present Amateur Extra Class, with telephony sub-bands =
expanded by 50 kHz in the 3.5 MHz and 21 MHz bands, and by 25 kHz in =
the 7 MHz band. To upgrade from Class B to Class A, an amateur would be =
required to pass the most substantial written examination in the =
sequence. Consistent with the practice in many other countries, no =
additional telegraphy examination would be required beyond 12 words per =
minute. All amateurs presently licensed as Amateur Extra Class would =
become Class A.=20

The League's objective in proposing this comprehensive plan is to =
rationalize and simplify the amateur licensing structure without =
reducing the technical knowledge required for any class of license. =
Where reductions in telegraphy requirements are proposed, there is =
proposed a corresponding increase in substantive written examination =
standards. On the other hand, the League firmly believes that =
simplifying the structure should not come at the expense of privileges =
already earned by amateurs. Therefore, present Novice and Technician =
Plus licensees, having earned entryHF operating privileges, would be =
granted the new entry-level HF license, and afforded increased =
operating privileges in the process.=20

This simplification plan marks the culmination of 30 months of work by =
the League, during which time the input of thousands of League members =
and other amateurs, and as well the input of prospective amateurs, was =
considered. The League considered and actively debated a wide variety =
of options including both smaller and larger numbers of license =
classes, higher and lower qualification levels, and different =
privileges. While not unanimous, this proposal should be considered a =
"refereed" plan, which we would propose to you for consideration and =
adoption in its entirety.=20

We would be most pleased to discuss this with you or your respective =
staffs, and would welcome the opportunity to provide further =
information to your offices concerning the substantial benefit and =
contributions of the Amateur Service to the educational, public safety, =
and public service needs of the United States. For the benefit of your =
Wireless Telecommunications Bureau staff, the League's web site, =
www.arrl.org, has a comprehensive review of this proposal and all of =
its details. Please consider this restructuring plan as a means of =
modernizing and simplifying amateur radio licensing, and a means of =
making Amateur Radio available to more people.=20

Respectfully submitted,=20

THE AMERICAN RADIO RELAY LEAGUE,
INCORPORATED=20

By: _____=20
Christopher D. Imlay
Its General Counsel=20

cc: Daniel Phythyon, Esquire
D'Wana Terry, Esquire
Mr. William Cross

Yours truly

James R Parsons {N5FYV}

-----=_NextPart_000_01BDC78B.F0A976E0--